

MAZIE SLATER KATZ & FREEMAN, LLC

103 Eisenhower Parkway, Suite 207, Roseland, NJ 07068

Phone: (973) 228-9898 - Fax: (973) 228-0303

www.mazieslater.com

David A. Mazie*
Adam M. Slater*^o
Eric D. Katz*^o
David M. Freeman
Beth G. Baldinger
Matthew R. Mendelsohn*^o
David M. Estes
Adam M. Epstein

Karen G. Kelsen^o
Cory J. Rothbort*^o
Michael R. Griffith^o
Christopher J. Geddis
Samuel G. Wildman
Julia S. Slater^o
Trevor D. Dickson

^oMember of N.J. & N.Y. Bars

*Certified by the Supreme Court of
New Jersey as a Civil Trial Attorney

February 16, 2024

VIA ECF

Honorable Robert B. Kugler
United States District Court
Mitchell H. Cohen Building and
U.S. Courthouse
4th and Cooper Streets
Camden, New Jersey 08101

Re: IN RE: VALSARTAN N-NITROSODIMETHYLAMINE (NDMA) PRODUCTS
LIABILITY LITIGATION
Civil No. 19-2875 (RBK/JS)

Dear Judge Kugler:

Please accept this letter in support of the parties' joint request for the Court's permission to allow the parties to file a total of 80 pages of briefing on both sides with regard to the motions in limine as to all parties, which are due to the Court today per the prior agreement of the parties and the Court, with the parties to have the same page limits for the responses. For the Court's consideration, Plaintiffs intend to submit two briefs today, an approximately 60-page Omnibus brief encompassing all but one of the motions to be filed by Plaintiffs, and an approximately 15-page brief focused solely on the single subject of the presentation of deposition designations at trial. It is our understanding that the Defendants may be filing an omnibus brief and separate Defendant specific briefs.

Related, the parties will be filing a proposed stipulation addressing a number of issues that the parties were able to reach agreement on.

Please let us know if this is acceptable. If the Court requires any further information, we are of course available.

Honorable Robert B. Kugler
United States District Court
February 16, 2024
Page 2

Thank you for your courtesies and consideration.

Respectfully,

A handwritten signature in dark ink, appearing to read "ADAM M. SLATER".

ADAM M. SLATER

cc: All Counsel via ECF